

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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IN RE BLUE APRON HOLDINGS, INC.  
SECURITIES LITIGATION

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) No. 17-cv-04846-WFK-PK  
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) This Document Relates To: ALL ACTIONS  
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**NOTICE OF UNOPPOSED MOTION FOR ENTRY OF ORDER PRELIMINARILY  
APPROVING SETTLEMENT AND ESTABLISHING NOTICE PROCEDURES**

PLEASE TAKE NOTICE that Lead Plaintiffs Christina Davis, Sanzhar Khussainov, Stephen Waugh, and Susan Finkel (“Plaintiffs”), individually and on behalf of all others similarly situated, will hereby move this Court on a date and at such time as may be designated by the Honorable William F. Kuntz, United States District Judge of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for entry of an Order: (1) preliminarily certifying the Settlement Class for the purposes of settlement; (2) preliminarily approving the terms of the Settlement as set forth in the Stipulation of Settlement (“Stipulation”), filed concurrently herewith; (3) approving the form and method for providing notice of the Settlement; and (4) scheduling a Settlement Approval Hearing and deadlines for mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion for Final Approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.

This motion is based on this Notice of Unopposed Motion, the Stipulation and all exhibits attached thereto, Plaintiffs' supporting Memorandum of Law, all filed contemporaneously herewith, and all pleadings, records, and papers on file herein.

Defendants do not oppose the relief requested by this motion. Accordingly, Plaintiffs request that the Court enter the [Proposed] Order Granting Lead Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, a copy of which is attached as Exhibit A to the Stipulation.

Dated: October 30, 2020

Respectfully submitted,

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*Additional Counsel for Plaintiffs and the Settlement  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2020, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

By: /s/ Phillip Kim  
Phillip Kim